## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE

MIGUEL A RODRIGUEZ RODRIGUEZ ERICA PEREZ RODRIGUEZ DEBTOR(S)

BANCO POPULAR DE PUERTO RICO Movant

VS.

MIGUEL A RODRIGUEZ RODRIGUEZ ERICA PEREZ RODRIGUEZ ALEJANDRO OLIVERAS RIVERA, TRUSTEE CASE NO. 11-05769-BKT

**CHAPTER 13** 

## DEBTORS' RESPONSE TO MOTION REQUESTING RELIEF FROM THE AUTOMATIC STAY

TO THE HONORABLE COURT:

**COME NOW** debtors in the above captioned case, through the undersigned attorney, and respectfully state and pray as follows:

- 1. Banco Popular de PR filed a motion requesting relief from the automatic stay basically stating that debtors have three (3) post-petition payments in arrears in their post-petition direct mortgage loan payments.
- 2. Debtors hereby respectfully submit that they are in the process of obtaining the funds to cure the arrears in direct post-petition payments to Banco Popular de PR, and request an extension of time of thirty (30) days to cure the arrears, which extension of time expire on June 30, 2012.

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Debtors' Response to Motion Requesting Relief to the Automatic Stay

Case no. 11-05769-BKT

WHEREFORE, debtors respectfully request from this Honorable Court to

deny the motion for relief from stay filed by Banco Popular de Puerto Rico;

debtors request that they be granted additional 30 days to pay the arrears,

and/or request the Court to schedule a final hearing.

I CERTIFY that on this same date a copy of this notice was sent by the

Clerk of the Court using CM/ECF systems which will send notifications of such

to the Chapter 13 Trustee; Banco Popular de PR c/o Cardona Jimenez Law

Offices, Esq; and also certify that I have mailed by United States Postal Service

copy of this motion to the following non CM/ECF participants: debtors, Miguel

A Rodriguez Rodriguez and Erica Perez Rodriguez HC 50 Box 23882 San

Lorenzo PR 00754.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 31st day of

May, 2012.

|s| Roberto Figueroa Carrasquillo

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